

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6309-Cr-Seitz

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH RUSSO and DOREEN RUSSO,

Defendants.

**AGREED MOTION FOR PERMISSION TO MOVE**

Defendants Joseph Russo and Doreen Russo, by and through undersigned counsel, respectfully requests that the Court enter an Order granting him permission to move his residence In support of this motion, the defendant states:

1. The Defendants currently own and reside at 11255 S. W. 93<sup>rd</sup> Court, Miami, Florida 33176.

2. As a result of the Plea Agreement entered into between Defendant Joseph Russo and the Government, it was agreed that Mr. and Mrs. Russo would sell their residence in order to obtain the necessary funds with which to pay restitution in the amount of \$130,000.00.

3. Undersigned counsel can verify that the house has in fact been sold and has spoken to counsel representing the Defendants in the sale, as well as to the real estate agent involved. If the Court requires, a copy of the sales contract can be provided.


*United States of America v. Joseph Russo, et al,*  
Case No. 00-6309-Cr-Seitz

4. The Defendants' anticipated new address is 2451 Brickell Avenue, Apartment 8-M, Miami, Florida 33129.

5. Counsel has discussed the content of this Motion with Assistant United States Attorney Diana Fernandez and Ms. Fernandez stated she has no objection to the Court granting the relief sought herein.

WHEREFORE, the Defendants respectfully request that this Honorable Court enter an order permitting them to sell their home and change their residence.

**JAYNE C. WEINTRAUB, P.A.**  
Bank of America Tower, #3550  
100 S.E. 2d Street  
Miami, Florida 33131-2154  
Telephone: 305-374-1818  
Fax: 305-358-5917

By:  FOR  
**Jayne C. Weintraub, Esq.**  
**Florida Bar No. 320382**

*United States of America v. Joseph Russo, et al,*  
Case No. 00-6309-Cr-Seitz

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered by mail this 19<sup>th</sup> day of April, 2002 to **Brian McCormick, Esq. and Diana Fernandez, Esq., Assistant United States Attorneys**, 500 E. Broward Blvd., Suite 700, Ft. Lauderdale, FL 33394.

By:  for  
**Jayne C. Weintraub, Esq.**